

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SUMMER CAMPBELL,

Plaintiff.

v.

LIBERTY MUTUAL  
INSURANCE,

Defendant.

Case No. 1:23-cv-5101

Judge John F. Kness

Magistrate Judge M. David Weisman

**JOINT STATUS REPORT**

Pursuant to the Order entered by Magistrate Judge Weisman (Dkt. #146) on December 8, 2025, Plaintiff Summer Campbell and Defendant Liberty Mutual Insurance submit the following Joint Status Report.

1. The Parties have exchanged additional settlement proposals and only have three outstanding items:
  - a. Final monetary settlement;
  - b. Identification, return and/or destruction (as applicable) of any proprietary information still in Plaintiff's possession; and
  - c. The identification, and removal, of (as applicable) currently known social media posts in which Plaintiff identifies or mentions Liberty Mutual, or its employees, from December 2022 through the present.
2. The Parties are hopeful that they can resolve these issues within the next 1-2 weeks.

3. Counsel for Plaintiff continues to recover from his surgery on December 15, 2025, and therefore the parties request that the next status set for January 7, 2026, at 9:15 am be moved to a telephonic status hearing.

4. Ultimately, the parties anticipate being able to resolve this matter informally and will advise the Court as soon as they are able to do so.

5. The parties anticipate that they will be able to indicate the date by which they will file a stipulation to dismiss in their next Joint Status Report.

Respectfully submitted,

SUMMER CAMPBELL

LIBERTY MUTUAL INSURANCE

By: s/Randall D. Schmidt  
Settlement Assistance Counsel

By: s/Erin Dougherty Foley  
Defendant's Attorney

Randall D. Schmidt  
[r\\_schmidt@uchicago.edu](mailto:r_schmidt@uchicago.edu)  
Edwin F. Mandel Legal Aid Clinic  
of the University of Chicago Law School  
6020 S. University Ave.  
Chicago, IL 60637  
Telephone: (773) 702-9611

Erin Dougherty Foley  
[edfoley@seyfarth.com](mailto:edfoley@seyfarth.com)  
SEYFARTH SHAW LLP  
233 South Wacker Drive, Suite 8000  
Chicago, Illinois 60606-6448  
Telephone: (312) 460-5000  
Facsimile: (312) 460-7000  
***Attorney for Defendant***

DATED: January 6, 2026